REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested. Currently, claims 1-16 and 23-54 are pending in this application.

Rejection Under 35 U.S.C. §112:

Claims 1-12, 31, 33 and 51 were rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. The Office Action states "Applying the or each template file..." is indefinite. To provide even further clarity and to advance prosecution, the recitation "the or each" has been deleted. Applicant thus respectfully requests that the rejection of claims 1-12, 31, 33 and 51 under 35 U.S.C. §112, second paragraph, be withdrawn.

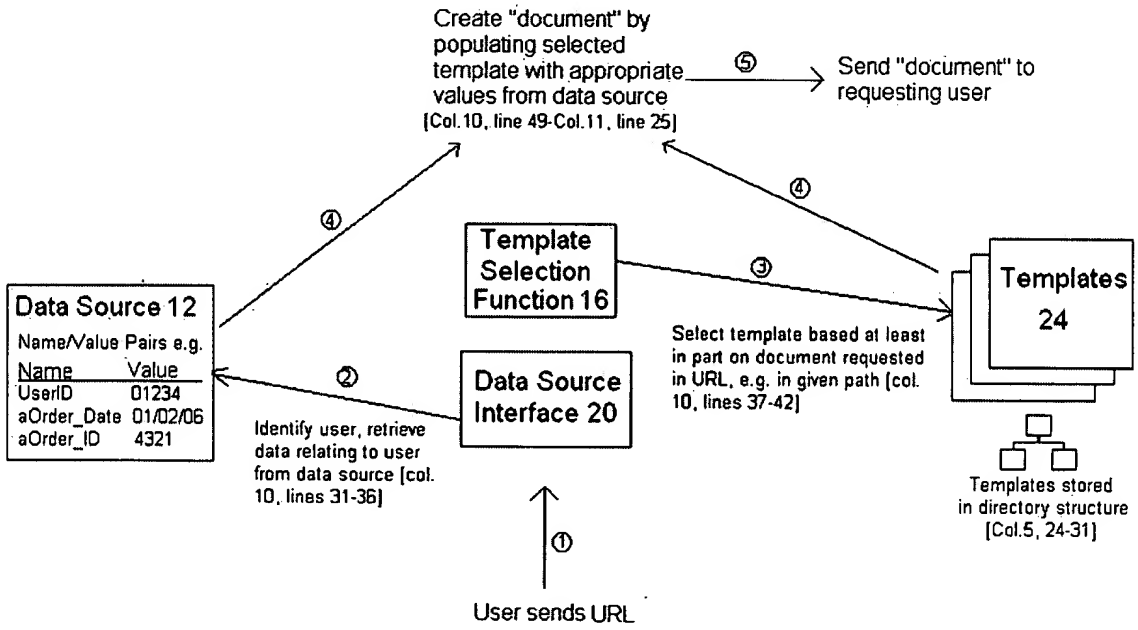
Rejection Under 35 U.S.C. §103:

Claims 1-16, 23-30, 35-38 and 47-54 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Donohue et al (U.S. '480, hereinafter "Donohue") in view of Schultz et al (U.S. '339, hereinafter "Schultz"). Applicant respectfully traverses this rejection.

In order to establish a *prima facie* case of obviousness, all of the claim limitations must be taught or suggested by the prior art and there must be some suggestion or motivation either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. The combination of Donohue and Schultz fails to teach or suggest all of the claim limitations. For example, the combination fails to teach or suggest "applying the one or more template files associated with a given directory to each content file stored in that given directory, wherein the respective directory in which each content file is stored

determines which of the one or more template files is applied; wherein the applying the one or more template files associated with a given directory to each content file stored in that directory generates a corresponding templated information-bearing content file whose appearance is controlled by the one or more associated template files," as required by independent claim 1 and its dependents. Similar comments apply to independent claims 5, 23 and 27 and their respective dependents.

The Office Action continues to state previous assumptions -- many of which are incorrect. In order to facilitate a proper understanding of Donohue, Applicant has provided below a diagram describing the operation of Donohue's system.



A data source 12 contains content reducible to name-value pairs, and a template store 24 stores at least one document template which can be located in a hierarchical directory structure. A user sends a request for a webpage by entering a URL in his browser. See step (1) in the above diagram. The request is interpreted by the script of the system to locate relevant data in the data source 12 (e.g., by identifying a stored

UserID corresponding to that of the user submitting the URL and retrieving his data), and to select an appropriate template in the template store. See steps (2) and (3) in the above diagram. The selected template is populated with the user's data and the result is a "document" which is displayed in the user's browser. See steps (4) and (5) in the above diagram. The document is therefore personalized in some way.

Contrary to the allegations on page 4 of the Office Action, Donohue does not disclose the following features of claim 1.

A. Locating one or more content files, each content file being stored in a directory of the computer file system.

The data source 12 is not stored in a directory of the computer file system. The data source 12 is simply a stored list reducible to name-value pairs.

The Office Action states the following: "Means" (Fig. 1, element 2 of Donohue) for "Locating one or more content files" corresponds to the command to locate documents (col. 7 lines 27-30 of Donohue). The "content files" corresponds to the "documents" that are stored in the data source 12 in Figure 1 (col. 7 lines 35-44).

However, these statements are incorrect since "documents" are not stored in the data source 12. A document is simply what results from populating a selected template with data from the data source 12 and which is then sent back to the user. (Again, see steps (4) and (5) of the above diagram). Documents do not exist in the computer system until a request is made in the form of a URL. The only entity that is disclosed as being stored in a directory of a file system is the one or more templates 24.

B. Associating one or more template files with each directory in which at least one content file is stored, each template being effective, when applied to the content file, to carry out a respective pre-determined operation on the content file.

Since Donohue does not disclose the first step of locating one or more content files in a directory of the computer file system, then there can be no associating one or more template files with a directory in which at least one content file is stored.

The Office Action states the following: "Means" (Fig.1, element 24 of Donohue) "Associating one or more template files with each directory in which at least one content file is stored", see col.5 lines 25-31 of Donohue. The documents stored in the web server contain different formats; therefore, when applying to the template, it will carry out a predetermined operation on the documents (col.1, lines 57-65).

The statements are unclear to Applicant. Col. 5 lines 25-31 of Donohue simply mentions that templates are stored in a directory structure on the web server and that each template corresponds to one of a plurality of possible documents which may be requested by users. What is clear is that there are no content files stored in the directory structure and the templates' location in the structure has nothing to do with associating the template with content to be modified by it. Col.1, lines 57-65 of Donohue relates to the prior art and mentions the word "document" in a traditional sense, that is as a webpage stored on a web server. However, in the context of Donohue's system, the word "document" has a different meaning as clarified above.

C. Applying the one or more template files associated with a given directory to each content file stored in that given directory, wherein the respective directory in

which each content file is stored determines which of the one or more template files is applied.

Since no content file is stored in a directory structure there can be no "applying" in the manner claimed. In Donohue, name-value pairs are applied to templates in accordance with a script selection function that has nothing to do with associating templates with directories in which content files are stored.

The Office Action states the following: "Means" (Fig.1, element 14 of Donohue) for "Applying the or each template file associated with a given directory to each content file stored in that given directory" col.7 lines 15-22 of Donohue. "Wherein the respective directory in which each content file is stored determines which of the or each template file is applied" col.5, lines 63-67, col.10, lines 43-48 of Donohue.

These statements of the Office Action are is incorrect since content files are not stored in any directory with which the template file is associated. The passages referred to do not justify the Office Action's position.

The Office Action acknowledges that the limitation "the directory stores the content file and the template" is not disclosed by Donohue. However, claim 1 does not require this feature. (Contrast with independent claims 13-16 and dependent claims 3, 7 and 11-12).

Donohue is therefore not particularly relevant to the claimed invention since it fails to disclose even the basic concept of locating content files in a directory structure and associating one or more template files with said directories to generate templated versions of the content files based on said association.

Moreover, Applicant submits that one of ordinary skill in the art would not have been motivated to modify Donohue to arrive at the present invention. In particular, Applicant submits that there is no motivation or reason as to why an association should be made between templates and directories in which content files are stored. One of ordinary skill in the art would not have been motivated to modify Donohue so that (a) the name-value pairs in the content store 12 would be moved to a directory structure and (b) templates be associated with each directory in which at least one name-value pair is stored. The main point of Donohue's system is to provide customized web pages based on who is requesting the web page. This customized web page is achieved by populating a selected template with values from name-value pairs corresponding to the requesting user (i.e., the person submitting the URL).

Schultz discloses a system for presenting data from a plurality of information sources to a user. The Office Action alleges that a content directory and a template directory are stored in the same place (col. 13, lines 54-56) and that Schultz teaches that "wherein the applying the or each template file associated with a given directory...generates a corresponding templated information-bearing content file whose appearance is controlled by the or each associated template file (col.13, lines 55-59) by applying the image file in the directory with the corresponding template in that directory."

Applicant submits that the above interpretation of Schultz does not accurately represent what a person of ordinary skill would understand from reading this document. First, the fact that a content directory and template directory are stored in the same place would not direct one skill in the art to modify Donohue to associate name-value pairs and

templates in the way claimed. In fact, content in Schultz's system is stored in a storage device 16 which is external to the content server 12, with the content directory 24 storing pointers to the content. (See col. 4, lines 24-36 of Schultz). Even if the teachings of Donohue and Schultz were combined, the result would therefore be replacing the data source 12 in Donohue with an external data source (such as storage device) with internal pointers to content in the data source, although there appears no advantageous reason why this would have been considered. Col. 13, lines 55-59 (specifically identified in the Office Action) of Schultz relates to a further directory (an image directory) which stores "template specific images." Applicant submits that the "template specific images" are images already forming part of a template (e.g., an image of a company logo that will appear at the top of a company template). The appearance of such an image is not "controlled" by its associated template since its appearance would be fixed. Modification of Donohue in light of this feature would merely result in the use of template specific images within templates 24.

Claims 23 and 27 require applying a template file to a document. The name/value pairs of data source 12 in Donohue merely form data and thus does not teach or suggest documents. Similar comments apply to independent claims 15-16.

Independent claim 13 requires, *inter alia*, "determining if the directory storing the one or more of the plurality of content files also stores the one of the plurality of template files; and applying the one of the plurality of template files to the one or more of the plurality of content files stored in the directory if a determination is made that the directory storing the one or more of the plurality of content files also stores the one of the plurality of template files so that each of the one or more of the plurality of content files

stored in the directory generates a corresponding templated information bearing content file whose appearance is controlled by the one of the plurality of template files." Similar, but not necessarily identical, comments apply to claims 14-16. The Donohue/Shultz combination fails to teach or suggest these limitations. For example, there is absolutely no teaching or suggestion of determining if data source 12 of Donohue storing the name/value pairs also stores one of the template files.

Claims 31-34 and 39-46 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over the three way combination of Donohue, Schultz and Popp et al (U.S. '108, hereinafter "Popp"). Applicant respectfully traverses this rejection. Even if the teachings of Donohue, Schultz and Popp were combined as proposed by the Office Action, the resulting combination would not have taught or suggested all of the claim limitations. For example, while Popp discloses multiple HTML templates to generate a single HTML document, there is not teaching of applying a template file associated with a parent directory of the given directory to each content file stored in the given directory in addition to applying the template file associated with the given directory to each content file stored in that given directory (see claims 31-34), or searching a parent directory for the one of the plurality of template files if a determination is made that the directory storing the one or more of the plurality of content files does not also store the one of the plurality of template files, and applying the one of the plurality of the template files stored in the parent directory to the one or more of the plurality of content files stored in the directory if the parent directory stores the one of the plurality of template files (see claims 35-38).

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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